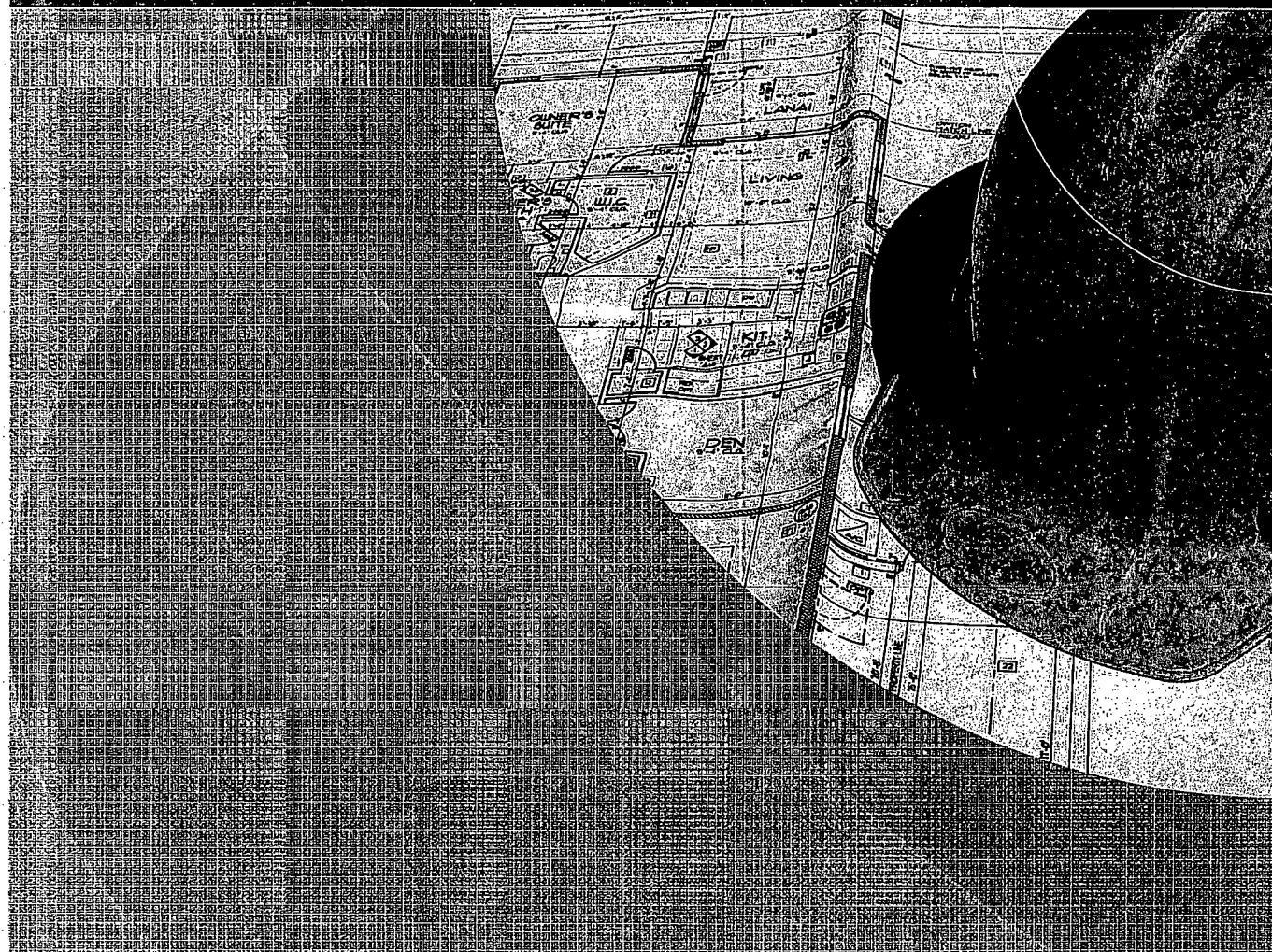




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Remedial Investigation / Feasibility Study

Cabo Rojo Groundwater Contamination Site



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TECHNICAL SCOPING MEETING

January 9, 2012

**CDM
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Project Team

- | | |
|---------------------|------------------------------|
| ◦ Jeanne Litwin | Program Manager |
| ◦ Brendan MacDonald | Site Manager |
| ◦ Seth Kellogg | RI Task Manager |
| ◦ Charlene Liu | Human Health Risk Assessment |
| ◦ George Molnar | Ecological Risk Assessment |
| ◦ Tony Isolda | FS Task Manager |
| ◦ Susan Schofield | Technical Advisor |
| ◦ Frances Delano | Project Geologist |

Objectives of this meeting

- Provide overview of Site and surroundings
- Provide overview of existing data
- Present and refine approach to the Remedial Investigation
- Discuss path forward

Cabo Rojo Groundwater Contamination Site

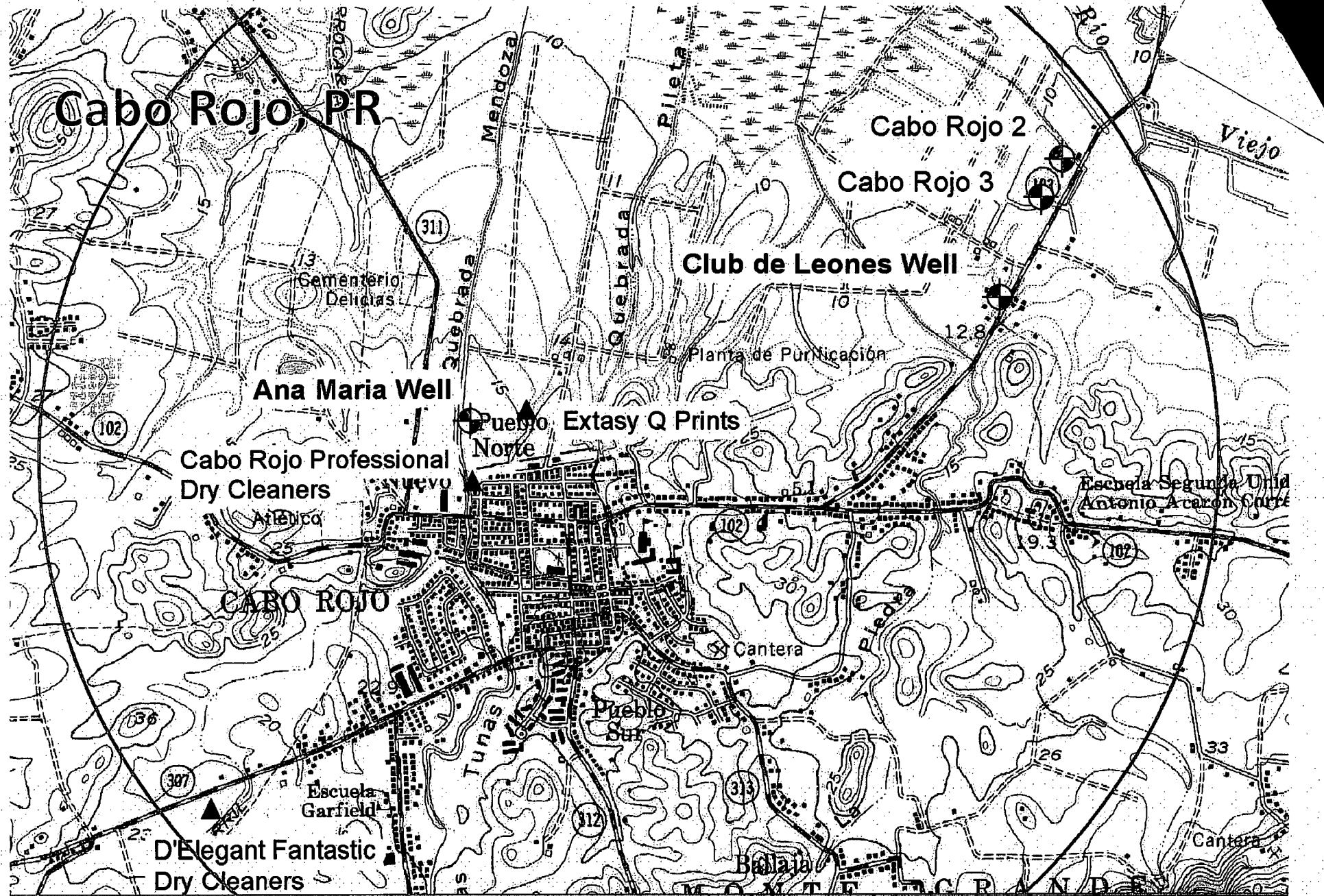
SITE DESCRIPTION

Cabo Rojo, PR



Cabo Rojo Groundwater Contamination Site Location

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Cabo Rojo Groundwater Contamination Site Location

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Cabo Rojo General

- Garment Manufacturing center
- Agriculture / Farming
- Water Supplies
 - Cabo Rojo Urbano System
 - 5 interconnected wells serve 45,055 persons
 - Cabo Rojo #2, Cabo Rojo #3, Club de Leones operating
 - formerly included Rio Guanajibo surface water
 - Ana Maria Well
 - Uniquely serves 1,856 persons
 - 14 to 20 area wells closed for reasons including VOCs < MCLs

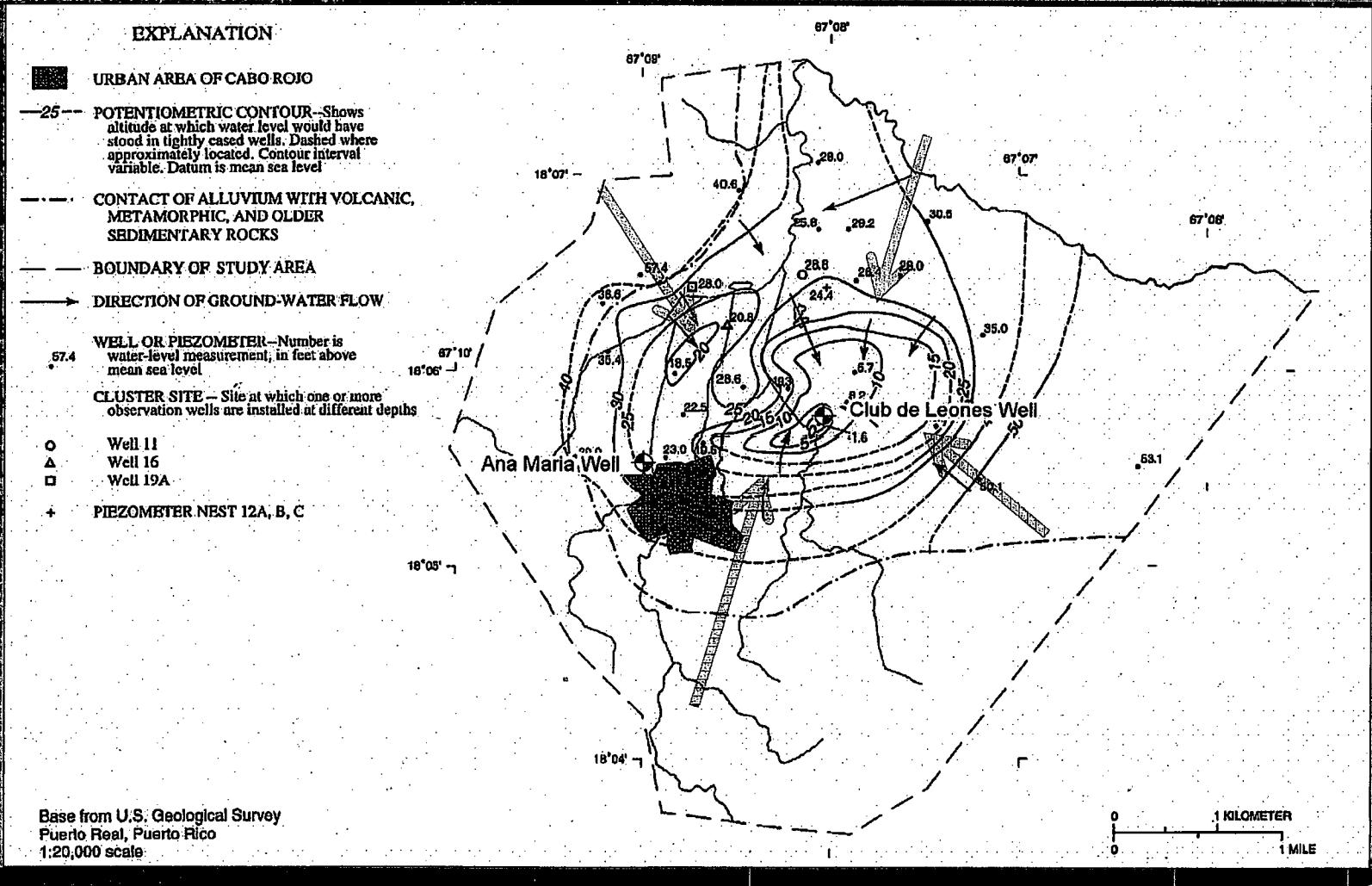
Site Geology and Hydrogeology

- Volcanic bedrock
 - Sabana Grande Formation
 - Lajas Formation
 - Yauco Formation
- Limestone bedrock (Cotui Limestone)
- Quaternary alluvium and swamp deposits
- Assume subsurface is fractured based on proximity of fault zones

Site Geology and Hydrogeology (continued)

- Study area aquifers consist mainly of alluvial deposits underlain by limestone bedrock
- Groundwater generally occurs under water-table conditions in the limestone and alluvial deposits
- Productive Aquifer
 - specific capacity: 2 to 18 (gal/min)/ft
 - transmissivity: 270 to 5,600 ft²/day
- Groundwater flow direction strongly influenced by the public water-supply well field cone of depression

Groundwater Flow: driven by supply wells



Surface Water

- Drainage flows from the highlands via local creeks into Río Viejo river and Ciénaga de Cuevas swamp area
- The Ciénaga was once a discharge feature of the aquifer
- Segments of the Río Viejo system and Ciénaga de Cuevas swamp are now sources of recharge to the aquifer, a result of operating supply wells (Cabo Rojo 2, Cabo Rojo 3, and Club de Leones)

Site Definition

Ana Maria well (200 ft bgs)

- 2002 – 2006 PCE and TCE < MCLs
- 2006 cis-1,2-DCE < MCL

Hacienda La Margarita well

- 2004 – 2006 PCE and TCE < MCLs

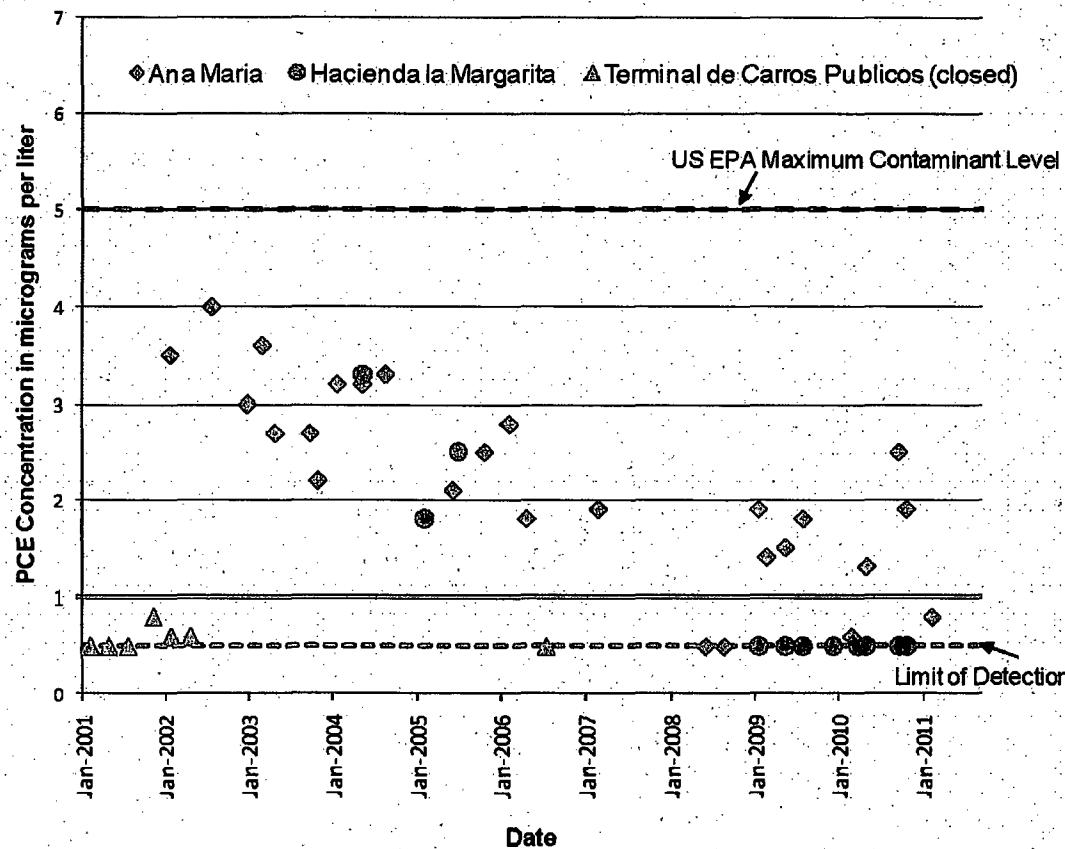
Club de Leones well (150 ft bgs)

- 2006 1,1-DCE < MCL

No source of groundwater contamination confirmed.

Ana Maria Well: Continual PCE, TCE, cis-1,2-DCE detection < MCL

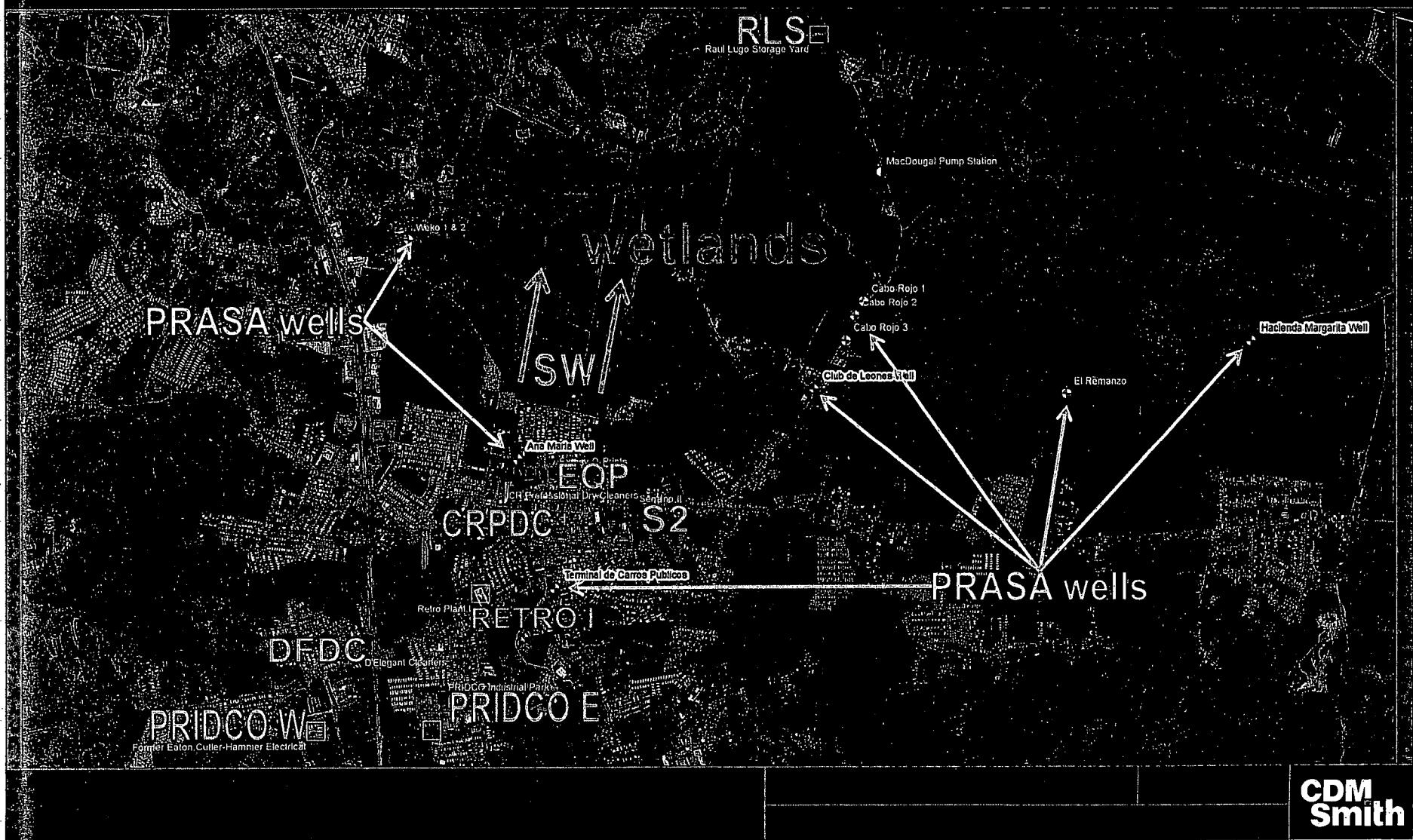
Figure 2. PCE Concentration Over Time in Cabo Rojo Public Supply Wells with Detections



Cabo Rojo Groundwater Contamination Site Definition

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Site Definition



Objectives of Remedial Investigation

Review/evaluate existing information to determine the minimum amount of data collection necessary to:

- complete characterization of the nature and extent of site contamination
- Identify and characterize sources of site contamination
- determine if a significant risk to human health or the environment exists
- support selection of a remedial approach

...all supporting a ROD

Historical investigations

USGS Hydrogeology and GW/SW relations

PRASA Monitoring

EPA Site Discovery Initiative

- Reconnaissance at 68 facilities → investigation at 12
- CVOC confirmations at 3 facilities
 - Soil: PCE (1)
 - Borehole GW: PCE (3), TCE (1), cis-1,2-DCE (1)
 - SV: PCE (3), TCE (3), cis-1,2-DCE (2)

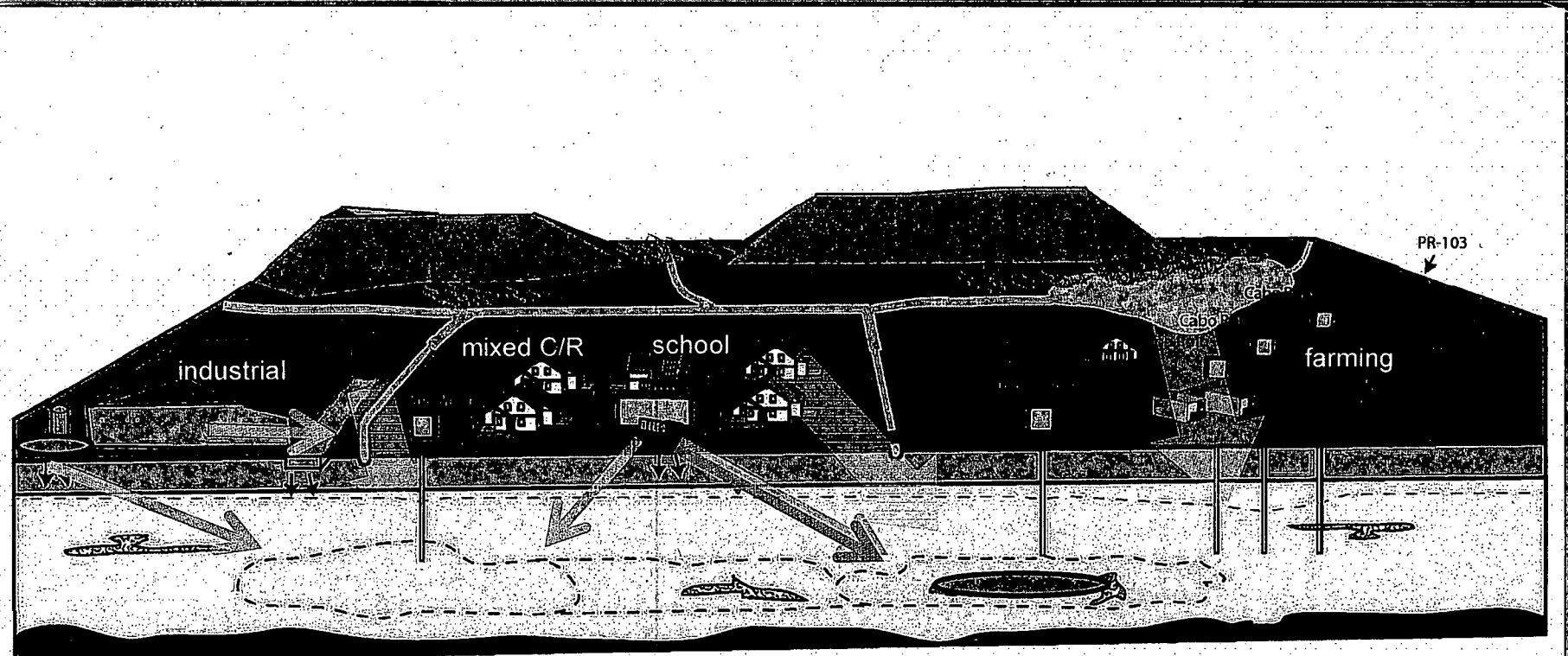
2011 Soil Vapor Investigation

- CVOC confirmations at 2 facilities
 - SV: PCE and TCE (1), DCE trace (1)

Key Assumptions

- Focused investigation of site-related contaminants (CVOCs)
- No migration to wetlands due to operation of supply wells
- No releases of CVOCs to catch basins
- Cabo Rojo Urbano system operation continues
- Future land use remains the same

Conceptual Site Model



LEGEND:

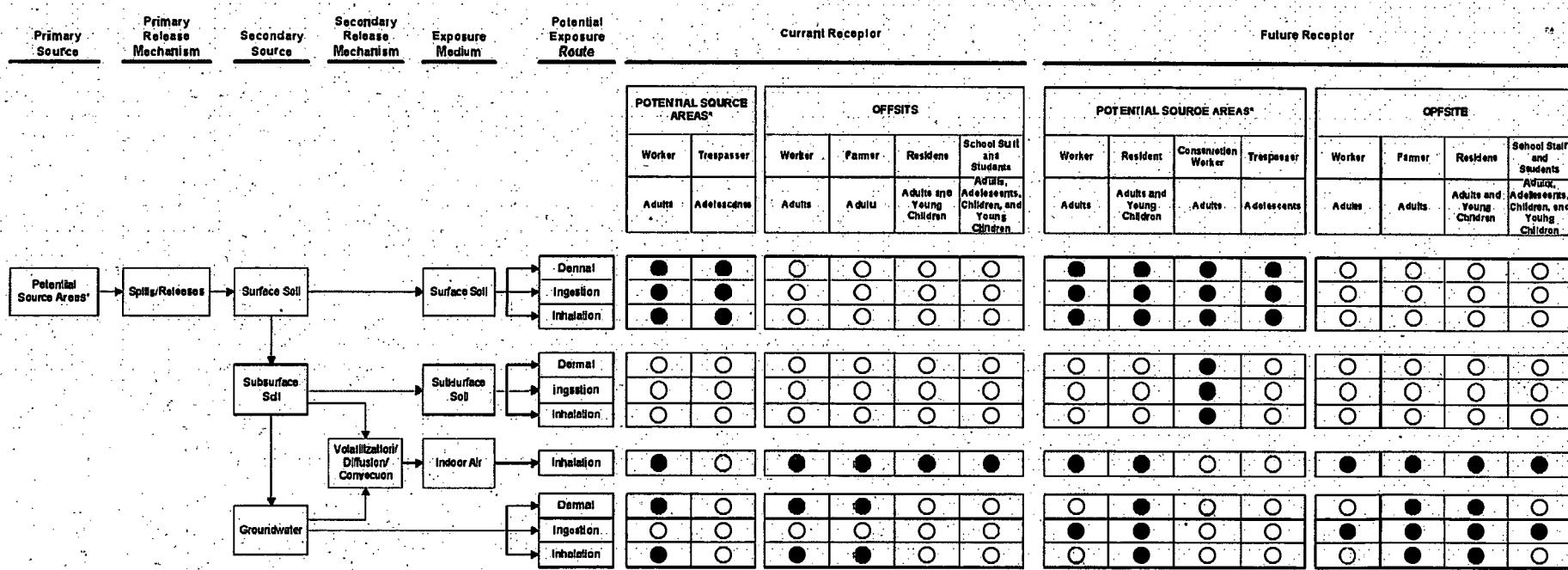
- [Box] Overburden → Groundwater and dissolved contaminant flow
- [Box] Limestone rock ▾ Water table
- [Box] Bedrock [Icon] Contamination plume
- [Icon] Potential solution features

Not to scale

Conceptual Site Model
Cabo Rojo Groundwater Contamination Site
Cabo Rojo, Puerto Rico

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Conceptual Site Model



**Cabo Rojo Groundwater Contamination Site
PROPOSED INVESTIGATION**

Field Investigation Sequence

- Potential Source Area (PSA) Reconnaissance
 - ❖ Collaborative Decision Point
- Production Well (PW) Evaluation
- PSA Investigations
- Drainage Features Investigation
 - ❖ Collaborative Decision Point
- Delineation of PSA Soil Contamination
 - ❖ Collaborative Decision Point
- Overburden and Multiport MW Installations
- Site-wide GW Sampling
- Indoor Air Evaluation (contingency)

Field Investigation Considerations

- Single Mobilization/Collaborative Reviews
- Focused Analytical Services
- Access
- Green Considerations

PSA Reconnaissance

Objective: to identify additional PSAs

- Assume up to 6 additional properties
 - Raul Lugo Storage Yard
 - Retro Plant 1
 - PRIDCO – West of PR 100
 - PRIDCO – East of PR 100
- Visual observations
- Interviews
- Identification of CBs / storm water features which may influence transport of contamination

❖ Collaborative Decision Point

Reconnaissance Findings to be Discussed with EPA throughout activity and during concurrence teleconference

- Determine if further investigation is warranted for each PSA
- Receive concurrence on sampling locations for PSA Investigations
- Reevaluate site access requirements
- Update CSM
- Develop schedule for PSAs

Production Well Evaluation

Objective: Evaluate hydraulic properties and contaminant distribution within the production wells

- Removal of production wells from service (PRASA)
- Downhole geophysics
- Discrete interval sampling for VOCs and major cations / anions
- Continuous GW elevation measurement

Downhole Geophysical Logging

Objective: provide data to define hydraulic properties (lithology, fracture zones, vertical flow, and water bearing zones)

- Mechanical caliper
- Optical and acoustic televiewer
- Natural gamma
- Vertical flow (static and pumped heat pulse flowmeter)
- Fluid resistivity and fluid temperature
- Data evaluation in field to identify depths of wireline discrete fracture zone sampling

Fracture Zone Sampling

Objective: determine contaminant distribution within bedrock for site characterization and multiport MW design

- Discrete GW screening samples
 - TCL VOCs and major cations / anions w/48-hr TAT on preliminary results (explore local NELAP option)
- Logging data reviewed on an ongoing basis
- Conferring with EPA regarding sampling intervals
- 17 samples at each of 4 boreholes

PSA Investigations

Objective: Characterize the extent of contamination at the PSAs and evaluate the potential for contaminant transport by surface water or sediment

- Soil Vapor Screening Samples
- Soil Screening Samples
- Groundwater Screening Samples
- CB standing water and sediment sampling

PSA Investigations

- Soil Vapor Screening (6 PSAs not previously investigated)
 - Samples at ≤10 locations screened via field GC for VOCs
 - 10% confirmatory analyses via fixed-base Laboratory
 - 1st PSA: 48-hr TAT
 - Subsequent properties : standard TAT
- Soil Screening
 - Continuous cores via DPT at 10 SBs to the water table (40 ft bgs)
 - ≤ 30 samples screened via field GC for site-related VOCs
 - 0-2 ft bgs
 - water table
 - interval of highest PID reading

PSA Investigations (Continued)

- Groundwater Screening
 - Samples from ≤ 6 locations via DPT
 - water table
 - above bedrock
 - ≤ 12 samples screened via field GC for site-related VOCs
 - 10% confirmatory analyses via fixed-base laboratory (standard TAT)
- Catch Basin (CB) Sampling
 - Assume features to be sampled at 6 PSAs
 - ≤ 3 standing water samples for VOC and hardness via CLP
 - ≤ 3 sediment samples for VOC and TOC via CLP

❖ Collaborative Decision Point

Findings to be discussed with EPA throughout activity and during concurrence teleconference following each of 9 PSA investigations

- Preliminary results of VOCs in bedrock GW
- Preliminary results of PSA investigations (VOCs in soil and GW); concur on release confirmations
- Concur on inferred flow directions
- Determine need for source area soil delineation
- Determine if indoor air investigation is warranted.
- Revise CSM
- Propose locations for overburden wells at PSAs

PSA Soil Contamination Investigation

Objective: Delineate the horizontal and vertical extent of PSA soil contamination to support the risk assessments and feasibility study.

- Continuous cores via DPT at 10 SBs to the water table (40 ft bgs)
- ≤ 30 samples analyzed via CLP for TCL VOCs and TAL Metals
 - 0-2 ft bgs
 - interval of highest assumed contamination
 - Assumed ‘clean’ bottom
 - 50% for soil moisture, TOC, pH and grain size

Monitoring Well Installations

Objectives

- Evaluate GW quality in overburden at PSAs
- Evaluate contaminant migration and upgradient conditions
- Characterize vertical and horizontal distribution of contamination within bedrock
- Evaluate contaminant flow paths in the bedrock aquifer between PSAs and production wells

Activities include:

- Overburden well installation
- Multiport well installation

Overburden Monitoring Well Installations

- 3 MWs at up to 6 PSAs via HSA 4-inch diameter
- Screen intervals TBD based on the groundwater screening samples
- Assume decisions will be made on an ongoing basis at each PSA
 - no demobilization between PSA investigations and well installation

Multiport Monitoring Well Installations

- 8 Bedrock MWs via air rotary to 200 feet bgs
- Geophysical Logging
 - to define lithology, fracture zones, vertical flow, water bearing zones
- Wireline Fracture Zone Sampling
 - TCL VOCs, major cations / anions w/48-hr TAT for preliminary results
- Continuous communication between CDM Smith and EPA
 - field tasks to be completed sequentially with concurrent data evaluation to refine subsequent activities

Site Wide Groundwater Sampling

Objectives:

- Characterize distribution of GW contamination in bedrock and overburden aquifers
- Evaluate potential for natural attenuation
- Confirm contaminant flow path to PWs

Activities:

- 8 multiport wells, 6 ports each (48 samples) via FLUTE system
- 18 OB MWs via EPA Low Flow SOP
- Synoptic water levels and synoptic gauging

Groundwater Sampling: Analyses

	OB wells	Multiport Wells
Round 1		
TCL VOCs	18 (all)	48 (all ports)
TAL inorganics	6	24 (3 per well)
chloride, methane, ethane, ethene, nitrate/nitrite, sulfate, sulfide, ferrous iron, and TOC TSS, TDS, alkalinity, ammonia, hardness, and TKN		
DO, ORP (as Eh), turbidity, T, ferrous iron, conductivity	In field	In field
Round 2		
TCL VOCs	18 (all)	48 (all ports)
Additional analytical fractions may be eliminated if no significant detections are found in Round 1. CDM Smith will confirm Round 2 parameters with EPA prior to mobilization	TBD	TBD

Indoor Air Evaluation - Contingency

Objective: Evaluate the nature and extent of indoor and sub-slab vapor contamination resulting from RI activities

- If GW impacted by CVOCs is detected within 100 feet vertically or horizontally, CDM Smith will notify EPA and together evaluate the need for soil vapor and/or indoor air investigations
- Assume 2 properties, each requiring:
 - Up to 2 sub-slab samples
 - Up to 2 indoor air samples
 - VOCs via CLP

Risk Assessment Approach

Human Health Risk Assessment

Ecological Risk Assessment

- SLERA
 - PSAs: Soil
 - Quebradas (if releases identified): Sediment & Surface Water
- Step 3A - Refinement of COPCs
 - PSAs: Soil
 - Quebradas (if releases identified): Sediment & Surface Water

Action Items